

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

|                                 |   |                              |
|---------------------------------|---|------------------------------|
| <b>UNITED STATES OF AMERICA</b> | ) |                              |
|                                 | ) | <b>Criminal No. 11-186-S</b> |
| <b>v.</b>                       | ) |                              |
|                                 | ) |                              |
| <b>JOSEPH CARAMADRE</b>         | ) |                              |
|                                 | ) |                              |
| <b>and</b>                      | ) |                              |
|                                 | ) |                              |
| <b>RAYMOUR RADHAKRISHNAN</b>    | ) |                              |
|                                 | ) |                              |
| <b>Defendants.</b>              | ) |                              |

**NOTICE OF INDEX OF REDACTED DOCUMENTS**

The United States of America, by and through its undersigned attorneys, hereby files an "Index of Redacted Documents" from related matter Msc. 09-84S.

**Background**

In September 2009, the Government filed a motion to requesting authorization to conduct depositions pursuant to Federal Criminal Procedure Rule 15. The motion was filed under seal and assigned Miscellaneous Matter Number 09-84S. The government and the defendants in this criminal prosecution (who were then targets) subsequently filed numerous pleadings. On September 22, 2009, the Court issued an Order authorizing the depositions. In March 2012, the defendants filed a motion to suppress the depositions. The parties filed an "Assented to Motion to Unseal" Miscellaneous Matter 09-84S so that the documents filed therein could be referenced in order to litigate the motion to suppress. In a chambers conference, the Court directed the parties to

appropriately redact the documents and file redacted copies in the criminal case (Cr. No. 11-186S). The parties have agreed on the appropriate redactions. Accordingly, the government hereby files this index, with the redacted documents attached.

Respectfully Submitted,

PETER F. NERONHA  
UNITED STATES ATTORNEY

/s/ John P. McAdams  
JOHN P. McADAMS  
Assistant U.S. Attorney

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| <b>Previous Docket Entry In Sealed Matter 09-84S</b> | <b>Document Description</b>   | <b>Exhibit Number Used in Government's Response to Motion to Suppress</b> |
|--|---|---|
| 1  | Motion to Seal by United States   | N/A   |
| 2  | Order Granting Motion to Seal   | N/A   |
| 3  | Government's Motion to Take Rule 15 Depositions   | Ex.1  |
| 4  | Defendant's Memorandum in Opposition to Motion to Take Rule 15 Depositions                                  | Ex.4  |
| 5  | Government's Memorandum in Support of Its Motion to Take Rule 15 Depositions                                | Ex.2  |
| 6  | Defendant's Memorandum in Opposition to Motion to Take Rule 15 Depositions                                  | N/A   |
| 7  | Motion to Appear Pro Hac Vice   | N/A   |
| 8  | Order Granting Motion to Appear Pro Hac Vice  | N/A   |
| 9  | Post-Hearing/Government's Supplemental Memorandum in Support of Its Motion to Take Rule 15 Depositions      | N/A   |
| 10   | Exhibit List Re: Motion Hearing on 9/17/12  | N/A   |
| 11   | Post-Hearing/Defendant's Memorandum in Opposition to Motion to Take Rule 15 Depositions                     | N/A   |
| 12   | Letter/Post-Hearing Defendant's Supplemental Memorandum in Opposition to Motion to Take Rule 15 Depositions | N/A   |
| 13   | Post-Hearing/Defendant's Supplemental Memorandum in Opposition to Motion to Take Rule 15 Depositions        | N/A   |
| 14   | Transcript Request for Proceedings Held on 9/17/09  | N/A   |
| 16   | Transcript of Motion Hearing Held on 9/17/09  | Ex.3  |
| 17   | Transcript Request for Proceedings Held on 9/17/09  | N/A   |
| 19   | Emergency Motion to Extend Stay   | N/A   |
| 20   | Government's Response in Opposition to Motion to Extend Stay  | N/A   |
| 22   | Government's Motion to Unseal   | N/A   |
| 23   | Motion for Service Subpoena Duces Tecum Pursuant to Rule 17(c)  | N/A   |
| 24   | Government's Notice of Motion to Take Additional Rule 15 Deposition   | N/A   |
| 25   | Defendants' Motion to Take Rule 15 Deposition   | N/A   |
| 26   | Government's Response to Defendants' Motion to Take Rule 15 Deposition                                      | N/A   |
| 27   | Opinion and Order   | N/A   |

| <b>Previous Docket<br/>Entry In Sealed<br/>Matter<br/>09-84S</b> | <b>Document Description</b>   | <b>Exhibit Number Used in<br/>Government's Response to Motion<br/>to Suppress</b> |
|--|---|---|
| 28   | Defendant's Motion for Protective Order   | N/A   |
| 31   | Certificate of Service  | N/A   |
| 32   | Response in Opposition to Government's<br>Objection to Motion for Protective Order    | N/A   |
| 33   | Notice of Appearance  | N/A   |
| 34   | Defendant's Objection to Government's<br>Objection to Motion to File Protective Order | N/A   |
| 37   | Notice of Appearance  | N/A   |
| 44   | Notice of Appearance  | N/A   |
| 30   | Defendant's Objection to Government's<br>Objection to Motion to File Protective Order | N/A   |

**CERTIFICATE OF SERVICE**

I, hereby certify that on this 2<sup>nd</sup> day of April, 2012, I caused the within Notice of Index of Redacted Documents to be served via the Court's Electronic Filing System on:

**For Joseph Caramadre:**

Michael J. Lepizzera, Esq.  
James T. McCormack, Esq.

**For Raymour Radhakrishnan:**

Olin Thompson, Esq.

/s/John P. McAdams

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